

### **REMARKS**

In the Final Office Action mailed June 20, 2005, claims 1-24 were rejected. The Examiner objected to claim 20. Applicants have thoroughly reviewed the outstanding Office Action including the Examiner's remarks and the references cited therein. Claims 1, 5, 11, 13, 17, and 20-24 have been amended. The following remarks are believed to be fully responsive to the Office Action. All the pending claims at issue are believed to be patentable over the cited references.

### **CLAIM FORMALITY**

The Applicants have amended claims 1, 5, 11, 13, 17, and 21-24 to replace the abbreviations AFS, APS, and BOI with the phrases "application function server," "Activer Server Page," and "business object interface," respectively. These amendments are made merely to improve the form of the claims. This change does not affect the scope of the claim whatsoever.

### **CLAIM REJECTIONS – 35 U.S.C. § 112**

Claims 21 and 22 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Office Action states that the term "setting and/or retrieving valves for fields . . ." is not enabled in the specification and is considered new matter. The Applicants have corrected this obvious typographical error so that "valve" has been replaced with "value." In light of the amendment, Applicants respectfully request that the rejection of claims 21 and 22 under 35 U.S.C. § 112, ¶ 1 be removed.

**CLAIM REJECTIONS – 35 U.S.C. § 103(a)**

Claims 1-5, 11-18, 20, and 23-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Number 6,289,382 (“Bowman-Amuah”) in view of U.S. Patent Number 6,889,227 (“Hamilton”). Claims 6-10, and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bowman-Amuah in view of U.S. Patent Number 6,405,111 (“Rogers”).<sup>1</sup>

The Examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. *MPEP* § 2142. To establish a prima facie case of obviousness, three criteria must be met. First, there must be some suggestion or motivation, to modify the references or to combine reference teachings. Second, there must be reasonable expectation of success. Finally, the prior art must teach all the claim limitations. *MPEP* § 2142.

Bowman-Amuah relates to software patterns and more particularly to aiding a system in need of service by locating a service provider capable of delivering the required service, wherein this is accomplished by way of a globally addressable interface. Bowman-Amuah, Col. 1, lines 22-26. Hamilton relates to a system and process that enables a database call to be converted to a general programming language call which in turn invokes another corresponding database call. Hamilton, col. 2, lines 30-34. A response to the Office Action’s application of Bowman-Amuah and Hamilton to the independent claims as follows.

***Claim 1***

The Office Action states that Bowman-Amuah teaches a method for accessing a Baan server (fig. 28, ref. 2820; col. 106, lines 9-13). The Applicants respectfully disagree. Bowman-

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<sup>1</sup> Applicants object to the rejection of claims 6-10 and 19 as improper because while the rejection states a reliance on only Bowman-Amuah and Rogers, the text of the rejections relies on Bowman-Amuah, Rogers AND Hamilton. Thus the rejection is incomplete and improper.

Amuah merely states that the Base Services of the Netcentric<sup>2</sup> Architecture Framework includes Web Services (depicted by reference 2820 in figure 28) “which enable organizations to manage and publish information and deploy Netcentric applications over the Internet and intranet environments.” Bowman-Amuah, col. 106, lines 8-24. Bowman-Amuah does not disclose a method for accessing a Baan server, as claimed.

The Office Action states that Bowman-Amuah discloses sending data from a Visual Basic program (col. 34, lines 55-62) to a Baan server (Fig. 28, ref. 2820). The Applicants respectfully disagree. At the text cited in the specification, Bowman-Amuah merely discloses that “presentation services” is “one of those run-time services required when an application executes in a Netcentric environment.” Bowman-Amuah, col. 31, lines 45-47; FIG. 10, ref. 1000. Specifically, Bowman-Amuah merely discloses that the logical area identified as presentation services “enable[s] an application to manage the human-computer interface,” (Bowman-Amuah, col. 34, lines 55-56), and further discloses that “exemplary products that may be used to enable [presentation services] include[s] Visual Basic,” (Bowman-Amuah, col. 34, lines 61-62). At most, Bowman-Amuah discloses generically “capturing user actions and generating resulting events, presenting data to the user, and assisting in the management of the dialog flow of processing.” Bowman-Amuah, col. 34, lines 56-59. Bowman-Amuah, however, does not disclose sending data from a Visual Basic program to a Baan server, as claimed.

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<sup>2</sup> Bowman-Amuah discusses netcentric computing (abbreviated NCC) through the specification. Netcentric computing appears to be defined by its differences from traditional client/server systems. Specifically, “[i]n NCC systems, application logic can be packaged into components and distributed from a server machine to a client machine over a network. In traditional client/server systems, the application logic is split between the client and the server on a permanent basis; there is no dynamic distribution of application logic.” Bowman-Amuah, col. 32, lines 29-37.

The Office action states that Bowman-Amuah discloses receiving the data at the Baan server (fig. 150, ref. 15000-15002; col. 268, lines 47-50). The Applicants respectfully disagree. Bowman-Amuah merely discloses that “server components 15000 receiv[e] service request 15002.” Bowman-Amuah, col. 268, lines 47-48. Bowman-Amuah does not disclose receiving the data [from a Visual Basic program] at the Baan server, as claimed.

The Office Action states that Bowman-Amuah discloses storing information in the Baan server in response to the received data (col. 16, lines 23-29). The Applicants respectfully disagree. The cited portion of the Bowman-Amuah specification states that “ActiveX Controls work with a variety of programming languages including Microsof Visual C++, Borland Delphi, Microsoft Visual Basic programming system and, in the future, Microsoft’s development tool for Java, code named “Jakarta.” ActiveX Technologies also includes ActiveX Server Framework, allowing developers to create server applications.” This is completely irrelevant to the claim element of storing information in the Baan server in response to the received data. Thus, the Examiner has not shown that Bowman-Amuah discloses storing information in the Baan server in response to the received data, as claimed.

The Office Action states that while Bowman-Amuah does not, Hamilton does disclose utilizing the application function server to communicate the data to at least one software object of the Baan server to generate at least one Baan session object, or utilizing the Visual Basic program to communicate with the at least one Baan session object via the application function server. In particular, the Office Action states that Hamilton discloses a client computer system 14 that contains a client application 104 that interfaces with an application server 18, that the client application 104 may use a Visual Basic application to build an Application Protocol Interface, and that the application server 18 contains Enterprise Java Bean objects that process

queries from the client application 104. The Applicants respectfully disagree. Hamilton merely discloses accessing a database through Enterprise Java Bean objects. Hamilton, col. 6, lines 25-36. Hamilton does not disclose utilizing the application function server to communicate the data to at least one software object of the Baan server to generate at least one Baan session object, or utilizing the Visual Basic program to communicate with the at least one Baan session object via the application function server.

***Claim 11***

The Office Action states that Bowman-Amuah teaches a system for accessing a Baan server (fig. 28, ref. 2820; col. 106, lines 9-13. The Applicants respectfully disagree. As stated above with respect to claim 1, Bowman-Amuah merely states that the Base Services of the Netcentric Architecture Framework includes Web Services (depicted by reference 2820 in figure 28) “which enable organizations to manage and publish information and deploy Netcentric applications over the Internet and intranet environments.” Bowman-Amuah, col. 106, lines 8-24. Bowman-Amuah does not disclose a system for accessing a Baan server, as claimed.

The Office Action states that Bowman-Amuah discloses a network server containing a Visual Basic program (col. 34, lines 55-62). The Applicants respectfully disagree. At the text cited in the specification, Bowman-Amuah merely discloses that “presentation services” is “one of those run-time services required when an application executes in a Netcentric environment.” Bowman-Amuah, col. 31, lines 45-47; fig. 10, ref. 1000. Specifically, Bowman-Amuah merely discloses that the logical area identified as presentation services “enable[s] an application to manage the human-computer interface,” Bowman-Amuah, col. 34, lines 55-56, and further discloses that “exemplary products that may be used to enable [presentation services] include[s] Visual Basic,” Bowman-Amuah, col. 34, lines 61-62. At most, Bowman-Amuah discloses

generically “capturing user actions and generating resulting events, presenting data to the user, and assisting in the management of the dialog flow of processing.” Bowman-Amuah, col. 34, lines 56-59. Bowman-Amuah does not disclose a network server containing a Visual Basic program, as claimed.

The Office Action states that Bowman-Amuah discloses a Baan server, wherein the Visual Basic program is used to access the Baan server (col. 25, lines 43-50). The Applicants respectfully disagree. At the text cited in the specification, Bowman-Amuah merely discloses application servers being accessed from both traditional graphical user interface clients built in Powerbuilder and Visual Basic and from Web-based front ends accessing the application servers via a Web-server. Bowman-Amuah, col. 25, lines 46-49. Bowman-Amuah does not disclose a Baan server, wherein the Visual Basic program is used to access the Baan server.

The Office Action fails to address in any meaningful way the following elements of the claim: means for sending data from a Visual Basic program to an application function server of the Baan server, means for receiving the data at the Baan server, means for utilizing the application function server to communicate the data to a least one software object of the Baan server to generate at least one Baan session object, means for utilizing the Visual Basic program to communicate with the at least one Baan session object via the application function server, and means for storing information disposed in the Baan server in response to the received data. To the extent that these claim elements mirror the elements of claim 1, the Applicants direct the Examiner’s attention to the discussion of claim 1 through out this response. To the extent that these claim elements were not addressed at all within the Final Office Action, the Applicants object to this rejection as improper.

*Claim 17*

The Office Action states that Bowman-Amuah discloses a system for accessing a Baan server. Please see the discussion related to claim 11, above, for a discussion of this claim element.

The Office Action states that Bowman-Amuah discloses a computer means for accessing a network (Bowman-Amuah, col. 69, lines 23-30; FIG. 117, refs. 11700-11704). The Applicants respectfully disagree. First, applicants note that the text cited in the Office Action is a discussion of figure 17 of the Bowman-Amuah patent, but that the figure cited is figure 117. The Applicants suspect that figure 17 was not cited because it is wholly illegible in the patent. Second, the cited text is merely an excerpt of a much larger discussion (spanning from col. 67, line 27 to col. 92, line 12) discussing factors to consider when evaluating a vendor's product. Bowman-Amuah, col. 67, line 27-33. The cited text merely states that a vendor's product should be "message oriented," (Bowman-Amuah, col. 68, line 56 & col. 67, line 27-33), and that one common type of Message-Oriented Middleware implemented is called message passing which is a direct application to application communication model whereby a direct link between two applications that participate in the message exchange is always maintained. Bowman-Amuah, col. 69, lines 18-31. Figure 117 merely "illustrates the manner in which a client 11700 requests information from server objects 11702 via a network 11704." Bowman-Amuah, col. 241, lines 53-55. The cited text and figure in Bowman-Amuah do not disclose a computer means for accessing a network.

The Office Action states that Bowman-Amuah discloses a network server means for accessing a Baan server through a Visual Basic program (col. 25, lines 43-50). The Applicants respectfully disagree. At the text cited in the specification, Bowman-Amuah merely discloses

application servers being accessed from both traditional graphical user interface clients built in Powerbuilder and Visual Basic and from Web-based front ends accessing the application servers via a Web-server. Bowman-Amuah, col. 25, lines 46-49. Bowman-Amuah does not disclose a network server means for accessing a Baan server through a Visual Basic program.

The Office Action states that Bowman-Amuah discloses a Baan software means for managing and processing data as directed by the computer means (col. 38, lines 4-21). The Applicants respectfully disagree. First, the cited text is merely an excerpt of a much larger discussion (spanning from col. 36, line 52 to col. 38, line 21) of the items to consider when selecting a development tool used for programming of client applications. Bowman-Amuah, col. 37, lines 2 & 54-57. Second, the cited text merely discloses names of particular development tools that are scalable to support growth in application size, users, and developers. Bowman-Amuah, col. 38, lines 2-3. Bowman-Amuah does not disclose a Baan software means for managing and processing data as directed by the computer means.

The Office Action apparently states that Bowman-Amuah and Hamilton disclose means for sending data from a Visual Basic program to an application function server of the Baan server (Hamilton, Fig. 2, ref. 14, 18, and 20; col. 5, lines 52-65, col. 6, lines 1-63; Bowman-Amuah, col. 34, lines 55-62, Fig. 28, ref. 2820). The Applicants respectfully disagree. At the text cited in the specification, Bowman-Amuah merely discloses that “presentation services” is “one of those run-time services required when an application executes in a Netcentric environment.” Bowman-Amuah, col. 31, lines 45-47; FIG. 10, ref. 1000. Specifically, Bowman-Amuah merely discloses that the logical area identified as presentation services “enable[s] an application to manage the human-computer interface,” Bowman-Amuah, col. 34, lines 55-56, and further discloses that “exemplary products that may be used to enable



[presentation services] include[s] Visual Basic,” Bowman-Amuah, col. 34, lines 61-62. At most, Bowman-Amuah discloses generically “capturing user actions and generating resulting events, presenting data to the user, and assisting in the management of the dialog flow of processing.” Bowman-Amuah, col. 34, lines 56-59. Similarly, the portion of the Hamilton specification cited merely discloses accessing a database through Enterprise Java Bean objects. Hamilton, col. 6, lines 25-36. Thus, neither Bowman-Amuah, nor Hamilton disclose means for sending data from a Visual Basic program to an application function server of a Baan server, as claimed.

The Office Action states that Hamilton discloses means for receiving the data at the Baan server, means for storing information disposed in the Baan server in response to the received data, means for utilizing the application function server to communicate the data to at least one software object of the Baan server to generate at least one Baan session object, and means for utilizing the Visual Basic program to communicate with the at least one Baan session object via the application function server (fig. 2, ref. 1, 18, and 20; col. 5, lines 52-56; col. 6, lines 1-63). The Applicants respectfully disagree. Hamilton merely discloses accessing a database through Enterprise Java Bean objects. Hamilton, col. 6, lines 25-36. Hamilton does not disclose means for receiving the data at the Baan server, means for storing information disposed in the Baan server in response to the received data, means for utilizing the application function server to communicate the data to at least one software object of the Baan serve to generate at least one Baan session object, and means for utilizing the Visual Basic program to communicate with the at least one Baan session object via the application function server.

Further regarding the Office Action's combination of Bowman-Amuah and Hamilton, Applicants assert that it would not have been obvious at the time of the invention to modify the teachings of Bowman-Amuah in view of Hamilton to practice the claimed invention. It is the Patent Office's burden to demonstrate a motivation to combine references. *MPEP* § 2142. The Examiner has not demonstrated any suggestion or motivation to modify the references or to combine reference teachings, a reasonable expectation of success, or that the references teach all the claim limitations. In light of the above arguments regarding Hamilton, the cited references do not teach or suggest all the elements to support a finding of obviousness.

In light of the arguments and amendments discussed above, independent claims 1, 11, and 17 are believed to be allowable. Claims 2-10, 12-16, and 18-24 either directly or indirectly, depend from one of claims 1, 11, and 17, respectively. As such, claims 2-10, 12-16, and 18-24 are allowable at least by virtue of their ultimate dependency on one of independent claims 1, 11, and 17. Applicants respectfully request the rejection to these claims be removed.

**CONCLUSION**

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. If it is believed that the application is not in condition for allowance the Examiner is requested to contact the undersigned attorney if it is believed that such contact will expedite the prosecution of the application.

In the event this paper is not timely filed, Applicants petition for an appropriate extension of time. Please charge any fee deficiencies or credit any overpayments to Deposit Account No. 50-2036.

Respectfully submitted,

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